

WHEREAS, Defendants' deadline to respond to the Complaint is currently May 1, 2023 (*see* ECF No. 14); and

WHEREAS, in light of the agreement to resolve the claims alleged in this matter and the fact that an order granting the Approval Motion would obviate the need for Defendants to respond to the Complaint, the Parties agree that Defendants should not be required to answer, plead, or otherwise respond to the Complaint until after the Court rules on the Approval Motion and then only if the Court does not grant the Approval Motion;

IT IS HEREBY stipulated and agreed by and between Plaintiffs and Defendants that Defendants' deadline to respond to the Complaint should be stayed until such time as the Court enters an Order on the Approval Motion, and Defendants' answer, pleading, or other response to the Complaint shall be due 30 days after such Order if the Order does not result in approval of the settlement and termination and dismissal of the case.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

Dated: April 13, 2023

/s/ Sarah R. Schalman-Bergen

Sarah R. Schalman-Bergen (PA 206211)
Krysten Connon (PA 314190)
LICHTEN & LISS-RIORDAN, P.C.
729 Boylston St., Suite 2000
Boston, MA 02116
Tel.: (617) 994-5800
Fax: (617) 994-5801
ssb@llrlaw.com
kconnon@llrlaw.com

/s/ Richard G. Rosenblatt

Richard G. Rosenblatt (PA 59096)
MORGAN, LEWIS & BOCKIUS LLP
1701 Market St.
Philadelphia, PA 19103-2921
Tel.: (215) 963-5000
Fax: (215) 963-5001

*Attorneys for Defendants Amazon.com, Inc.
and Amazon Logistics, Inc.*

Ryan Allen Hancock (PA 92590)
WILLIG, WILLIAMS & DAVIDSON
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
Tel.: (215) 656-3600
Fax: (215) 567-2310
rhancock@wwdlaw.com

Michaela Wallin*
Alexandra K. Piazza (PA 315240)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel.: (215) 875-3000
Fax: (215) 875-4620
mwallin@bm.net
apiazza@bm.net

* *pro hac vice*

*Attorneys for Plaintiffs and the Proposed
FLSA Collective*

ATTESTATION REGARDING CONCURRENCE

In accordance with the Court's Local Rules and the Clerk's ECF Attorney User Manual for Civil Cases, I, Richard G. Rosenblatt, counsel for Defendants, attest that each other signatory listed above has concurred in this filing.

/s/ Richard G. Rosenblatt
Richard G. Rosenblatt

APPROVED AND SO ORDERED this ____ day of _____, 2023

BY THE COURT:

Mark A. Kearney, U.S.D.J.